

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI
ASSOCIATE CIRCUIT DIVISION**

Jasmine Green,
Plaintiff,

vs.

Syndicated Office Systems, LLC dba
Central Financial Control

Serve at:
Registered Agent- CT Corporation
System
120 S Central Ave
Clayton, MO 63105
Defendant,

)
) Case No.:

)
) Div. No.:

)
) **JURY TRIAL DEMANDED**

PETITION FOR DAMAGES

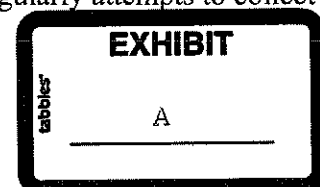
Comes now Plaintiff, Jasmine Green, by and through counsel; Matthew P. Cook, and states the following:

INTRODUCTION AND JURISDICTION

1. This is an action for statutory damages brought by an individual consumer for violations of the Fair Debt Collections Practices Act, 15 U.S.C. §1692 *et. seq.* ("FDCPA").
2. This Court has jurisdiction of the FDCPA claim under 15 U.S.C. §1692k(d).
3. Venue is appropriate in this Court because Defendant directed its illicit conduct at Plaintiff in St. Louis County, Missouri.
4. Plaintiff demands a trial by jury on all issues so triable.

PARTIES

5. Plaintiff is a natural person currently residing in St. Louis County, Missouri. Plaintiff is a consumer within the meaning of the FDCPA. The alleged debt owed arises out of consumer, family and household transactions.
6. Defendant is a corporation with its principal place of business in Anaheim, CA. The principal business purpose of Defendant is the collection of debts and Defendant regularly attempts to collect



debts.

7. Defendant is engaged in the collection of debts from consumers using the mail and telephone in Missouri. Defendant is a "debt collector" as defined by the FDCPA. 15 U.S.C. §1692a(6).

FACTS

8. Defendant's collection activity of which Plaintiff complains occurred within the previous twelve (12) months.

9. Defendant is reporting on Plaintiff's credit reports as a collection account for an alleged debt totaling \$296.00.

10. In response to Defendant credit reporting Plaintiff contacted Defendant on or around, April 6, 2017 in order to obtain more information about the alleged debt.

11. During the call Defendant offered Plaintiff a time-sensitive settlement offer for about \$200.00, or about 30% off the original balance. Defendant said that the offer was only good until the end of April 2017.

12. On or around, May 5, 2017 Plaintiff contacted Defendant again and asked if their time-sensitive settlement offer was still valid? Defendant advised that it was and offered the exact same settlement offer.

13. Defendant's time-sensitive settlement offers were not really time-sensitive.

14. Defendant also advised Plaintiff, during the April 6 call, that if Plaintiff paid on this account it would help her obtain financing for a house and would raise her credit score.

15. Defendant's assertions (§§ 11-14) were false or misleading representations intended to deceive Plaintiff to pay on the alleged debt in violation of 15 U.S.C. §1692e.

16. Defendant's collection attempts and misrepresentations have caused Plaintiff to incur actual damages, attorney's fees, as well as emotional distress and denial of credit.

COUNT I: VIOLATION OF THE FDCPA

17. Plaintiff re-alleges and incorporates by reference the above paragraphs.

18. Defendant regularly attempts to collect consumer debts asserted to be due to another and at all relevant times herein, was a "debt collector" as defined by 15 U.S.C. §1692a(6).

19. A single action on the part of the debt collector can violate multiple sections of the FDCPA.

20. In its attempts to collect the alleged debt from Plaintiff, Defendant has committed violations of the FDCPA, 15 U.S.C. §1692 *et. seq.* including, but not limited to the following:

a. Engaged in false, misleading and deceptive means in an attempt to collect a debt in violation of 15 U.S.C. §1692e;

WHEREFORE, Plaintiff respectfully requests that judgment be entered against Defendant for:

- A. Declaratory judgment that Defendant's conduct violated the FDCPA;
- B. Actual damages;
- C. Release of the alleged debt;
- D. Statutory damages, costs, litigation expenses and attorney's fees pursuant to 15 U.S.C. 1692(k); and
- E. For such other relief as the Court may deem just and proper.

By: /s/ Matthew P. Cook
Cook Law, LLC
Matthew P. Cook #62815
Attorney for Plaintiff
PO Box 220342
St. Louis, Missouri 63122
Phone: 314-200-5536
Email: Cookmp21@yahoo.com

17SL-AC12109

In the
CIRCUIT COURT
 Of St. Louis County, Missouri



For File Stamp Only

Jasmine Green
 Plaintiff/Petitioner

Date

Case Number

vs.

Syndicated Office Systems, LLC dba Central Financial Control
 Defendant/Respondent

Division

REQUEST FOR APPOINTMENT OF PROCESS SERVER

Comes now Plaintiff, pursuant

Requesting Party

to Local Rule 28, and at his/her/its own risk requests the appointment of the Circuit Clerk of

Daniel Defosset 1218 Gilbert, St. Louis, MO 63119 314 956 1852

Name of Process Server

Address

Telephone

Name of Process Server

Address or in the Alternative

Telephone

Name of Process Server

Address or in the Alternative

Telephone

Natural person(s) of lawful age to serve the summons and petition in this cause on the below named parties. This appointment as special process server does not include the authorization to carry a concealed weapon in the performance thereof.

SERVE:

r/a CT Corporation System

Name

120 S Central Ave

Address

Clayton, MO 63105

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Appointed as requested:

JOAN M. GILMER, Circuit Clerk

By

Deputy Clerk

Date

SERVE:

Name

Address

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Matt Cook

Signature of Attorney/Plaintiff/Petitioner

62815

Bar No.

Address

(314) 200-5536

Phone No.

Fax No.



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: JUDY PREDDY DRAPER	Case Number: 17SL-AC12109
Plaintiff/Petitioner: JASMINE GREEN	Plaintiff's/Petitioner's Attorney/Address: MATTHEW PAUL COOK P.O. BOX 220342 SAINT LOUIS, MO 63122 (314) 200-5536
Defendant/Respondent: SYNDICATED OFFICE SYSTEMS, LLC DBA: CENTRAL FINANCIAL CONTROL	Date, Time and Location of Court Appearance: 20-JUN-2017, 09:00 AM RM. 287 NORTH, DIV 41T ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: AC Other Tort	(Date File Stamp)

Associate Division Summons

The State of Missouri to: SYNDICATED OFFICE SYSTEMS, LLC
 Alias:
 DBA: CENTRAL FINANCIAL CONTROL
 120 SOUTH CENTRAL AVE
 CLAYTON, MO 63105

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court on the date, time, and location above to answer the attached petition. If you fail to do so, judgment by default will be taken against you for the relief demanded in the petition. You may be permitted to file certain responsive pleadings, pursuant to Chapter 517 RSMo. Should you have any questions regarding responsive pleadings in this case, you should consult an attorney.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739 or TTY at 314-615-4567, at least three business days in advance of the court proceeding.

05/19/2017

Date

Further Information:
SMB

John P. Shilling
Clerk

Sheriff's or Server's Return

Note to serving officer: Service must not be made less than ten days nor more than sixty days from the date the Defendant/Respondent is to appear in court.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years.
☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).
☐ other _____

Served at _____ (address)
 in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



**Service of Process
Transmittal**

05/19/2017

CT Log Number 531260368

TO: Debbie Fowler
Tenet Healthcare Corporation
1445 Ross Ave, Fountain Place, Suite 1400
Dallas, TX 75202-2703

RE: **Process Served in Missouri**

FOR: Syndicated Office Systems, LLC (Domestic State: CA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Jasmine Green, Ptlf. vs. Syndicated Office Systems, LLC, etc., Dft.

DOCUMENT(S) SERVED: Summons, Request, Petition

COURT/AGENCY: St. Louis City Circuit Court, MO
Case # 17SLAC12109

NATURE OF ACTION: Violation of Fair Debt Collection Practice Act

ON WHOM PROCESS WAS SERVED: C T Corporation System, Clayton, MO

DATE AND HOUR OF SERVICE: By Process Server on 05/19/2017 at 13:09

JURISDICTION SERVED : Missouri

APPEARANCE OR ANSWER DUE: 06/20/2017 at 09:00 a.m.

ATTORNEY(S) / SENDER(S): Matthew P. Cook
Cook Law, LLC
PO Box 220342
St. Louis, MO 63122
314-200-5536

ACTION ITEMS: CT has retained the current log, Retain Date: 05/20/2017, Expected Purge Date:
05/25/2017

Image SOP

Email Notification, Debbie Fowler debbie.fowler@tenethealth.com

Email Notification, Olga Barnes olga.barnes@tenethealth.com

SIGNED: C T Corporation System

ADDRESS: 120 South Central Avenue
Suite 400
Clayton, MO 63105

TELEPHONE: 314-863-5545